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Phil Grate  
Director Montana  
Regulatory and Legislative Affairs

March 3, 2015

Montana Public Service Commission  
Kate Whitney  
Division Administrator - Regulatory Division  
1701 Prospect Avenue  
Helena, MT 59620

Hand delivered to Debbie George

Re: October 17, 2014 oral presentation in Docket Nos. D2014.11.91 and N2014.4.38

Dear Ms. Whitney:

On March 18, 2014, the Montana Public Service Commission (PSC) staff sent a letter to Qwest Corporation doing business as CenturyLink QC ("CenturyLink QC") requesting certain service quality information.

The information included: trouble reports by month by exchange for the latest two years available; repeat trouble reports by month by exchange for the latest two years available; trouble reports per 100 access lines by month by exchange for the latest two years available; out-of-service (OOS) tickets for each exchange; the number of OOS tickets cleared in 24 hours; and the percentage of Out of Service (OOS) Cleared within 24 Hours ("OOS < 24 Hours").

After reviewing CenturyLink QC's service quality information, the Commission issued a Notice of Commission Action (Notice) on August 26, 2014, ordering CenturyLink QC to file within 60 days of the Notice a plan to improve repair times.

On October 17, 2014, CenturyLink made an oral presentation to the Commission, which contained detailed service quality and personnel deployment information and a description of the steps that would be necessary and the cost of those steps to meet the PSC's repair time standard of 90% OOS < 24 Hours.

On October 23, 2014, Qwest Corporation d/b/a CenturyLink QC filed a Motion for Protective Order, seeking protection of data that CenturyLink QC included in the October 17, 2014 oral presentation to PSC ("Exhibit B"). On December 30, 2014, the Commission entered Order No. 7388, which denied the Motion for Protective Order.

On January 9, 2015 CenturyLink QC filed a Motion for Reconsideration of Order No. 7388. CenturyLink QC's Motion for Reconsideration sought to protect a more limited set of data than the data for which it sought protection in its original Motion for Protective Order. Accompanying the Motion for Reconsideration, CenturyLink QC presented a

detailed redacted version of Exhibit B showing the exact data on each slide it wishes to protect. CenturyLink QC's Motion for Reconsideration sought to protect from public disclosure data that shows:

- (1) OOS < 24 Hours service quality metric by wire center;
- (2) the percent of Living units served by CenturyLink QC by wire center; and
- (3) the number of installation technicians in each CenturyLink QC wire center and garage location and the number of additional technicians needed to meet the 90% OOS < 24 Hours target in each wire center.

In its Motion for Reconsideration, CenturyLink QC stated that in accordance with Order No. 7388 it had removed from protective consideration data that is not wire center specific and provided this data as public in Exhibit B. The wire center (and garage specific) information for which CenturyLink QC sought protection was redacted in the Exhibit B filed with its Motion for Reconsideration.

On February 3, 2015, this matter came before the Commission at a work session, whereby the Commission granted reconsideration of Order No. 7388.

Order No. 7388b grants CenturyLink QC's Motion for Reconsideration and Motion for Protective Order. Order No. 7388b also provides that CenturyLink QC must produce the information consistent with Order No. 7388b within 14 calendar days of the service date of Order No 7388b, which is February 24, 2015. Accordingly, Centurylink QC must produce the information consistent with Order No. 7388b by March 10, 2015.

Attached to this transmittal letter on yellow paper is the confidential information protected from public disclosure under Order No. 7388b

Respectfully,

A handwritten signature in black ink, appearing to read "Philip E. Grate". The signature is fluid and cursive, with the first name "Philip" being the most prominent part.